

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA,
NORTHERN DIVISION. RECEIVED
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Richard Wayne Wright, Sr. Bey *

Plaintiff, Pro-Se., A.I.S # 187140 *

-VS-

Sylvester Nettles, et al., *

Defendants. *

DEBRA L. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

Case Action NO

2:05-CV-439-A-WO

Plaintiff Motion For An Appointment
Of Counsel

I Richard Wayne Wright, Sr. Bey
A.I.S # 187140, Pro-Se., am the plain-
tiff and Filed this (said) motion
Pursuant to 28 U.S.C. § 1915 (e) (1),
plaintiff Wright Sr. Bey moves for
an order appointing Counsel to
represent (him) in this case. In
support of this motion, plaintiff
states:

- 1). Plaintiff Wright, Sr. Bey cannot
afford to hire a lawyer. He has
request to proceed in Forma
pauperis in this case, in
which (said) Court granted
such request.

- 2). Plaintiff Wright, Sr. Bey imprisonment limits his ability to talk with inmates whom witness portion of plaintiff claims whom has (transferred, been release from prison, ect.) which testimonies are valuable in plaintiff presenting this case.
- 3). This case involves substantial investigation and discovery (Interrogatories, Inspection of Things and places, Requests for Admission).
- 4). A lawyer would help plaintiff to apply the law properly in briefs and before this Honorable Court
- 5). Plaintiff Wright Sr. Bey has never been a party to a civil legal proceeding of this magnitude that also involves criminal activity by defendants) which has been exhibited.
- 6). A lawyer would help plaintiff properly emerge and emend the relevancy of this Case and Case Richard Wayne Wright, Sr. -Vs- James Deloach, et al. Case No. CV-99-D-1405-N.
- 7). A lawyer would help plaintiff

persuade prison officials to turn over security-related documents (Administrative Regulations (A.R.); system operation procedures (S.O.P.); and relevant state and Federal codes / laws which prohibits certain acts of prison officials) that they do not want to have circulating in the prison.

8). A trial in this case will likely involve conflicting testimony and require testimony's of physician(s), psychologist(s), psychiatrist and sociologist.

9). The issues in this case are complex. A lawyer would help plaintiff get all the relevant document he requested in the order he submitted for production of documents which this Honorable Court granted in part.

10). Plaintiff has made repeated efforts to obtain a lawyer.

WHEREFORE, plaintiff Wright Sr. Bey requests that this Honorable Court appoint Counsel to represent him in this case.

Done this the 18th day of

July, 2006

Respectfully Submitted,
Richard W. Wright, Sr. Bey
Richard Wayne Wright, Sr. Bey #187140
Ventress Correctional Facility
Segregation Unit / cell #801
Post Office Box
Clayton, Alabama 36016

Certification of Service

This is to Certify that I Richard Wayne Wright, Sr. Bey, A.I.S. # 187140, Pro-Se., am the petitioner in the above encaptioned motion and Certify I have sent a copy of this to the clerk of this Court and earnestly ask due to plaintiff indigent status that this Honorable Court and/or Clerk Forward a Clock Stamp copy of the Front page of this (said) motion to plaintiff and Forward a copy of this (said) motion to defendant's Counsel(s) which addresses are as following:

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ASB - 2411-H67G-
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Kim T Thomas
Gregory Marion Biggs
Alabama Department of Corrections
Legal Division
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by placing this motion in the hands of
the on duty officer to placed ~~this~~
in the legal mail box For postage to
be payed by the prison officials here

at (V.C.F.) and to be place in the United States mail Box at (V.C.F.) after postage is supplied and this has been properly address this on the 18th day of July 2006.

RespectFully submitted,
Richard W. Wright, Sr. Bey

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